



MEMORANDUM

Date: March 28, 1990  
To: Distribution List  
From: Paul E. Takacs *PT*  
Subject: L1630200005 -- St. Clair County  
Sauget Sites (Area I) -- Sauget  
Superfund/Compliance

On March 22 and March 23, 1990, representatives from the IEPA and the Attorney General's Office met with the various PRP groups to discuss the progress of the ongoing negotiations for the RI/FS of Area I and II.

The Area I meeting on March 22 was attended by Monsanto, Cerro Copper and Empire Chemical. PRPs admitted that no proposal for an Area I RI/FS was being considered and that additional parties would have to be named before progress is to begin. Cerro indicated that at minimum, the current and former landowners should be noticed, but they were not specific as to what part they would play in the negotiations. In regards to Monsanto's reply to the RI/FS, they also agreed that more PRPs should be added. Empire Chemical (Midwest Rubber) had questions pertaining to their individual liability in Creek Segment B as well as our notification of the stockholders of GIT Corp (Midwest Rubber Reclaiming, Inc.)

Our decision on the issue of notifying current and former landowners will be to conduct the best possible title search and notify Area I PRPs in 30 days. A meeting will then be scheduled in the last week of May when an Area I RI/FS will be proposed.

In regards to Creek Segment A (CS-A) work, Cerro attorney Jay Stewart handed out a consent decree governing the remedial action for our consideration. He proposed that the State (as a formality) would bring suit against Cerro and that the settlement would be based on a mutually agreeable consent decree. The draft Site Investigation/Remedial Alternatives Evaluation should be received by March 30. IEPA will review the document and provide comments by April 16. The final report is due on April 30 with work scheduled to begin on May 7.

In other matters not directly related to these negotiations, the question of Monsanto's proposal for remediation in Creek Segment B (CS-B) was raised outside of the meeting. Since Monsanto has had difficulty in gaining access agreements for sampling in CS-B, they have asked IEPA to do the sampling with Monsanto providing the funds. They have not been specific on what action they may be considering.



Page 2

USEPA's efforts for cost recovery of fencing materials at CS-B have so far been unsuccessful. Both Monsanto and Cerro had been given an additional 30 days for payment. The other parties have not replied.

PT: rmi/1050n/1-2

cc: Bill Child  
Delbert Haschemeyer  
Terry Ayers  
Charles Zeal  
Bruce Carlson  
Ken Mensing  
Keri Luly  
Jim Morgan, AGO